

# EXHIBIT A

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
NORTHERN DIVISION

STEPHANIE MARIE BUCHANAN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:15-CV-00005-CDP
	)	
HARI KAPUR, M.D. and	)	<b>JURY TRIAL DEMANDED</b>
CORIZON HEALTH	)	
	)	
Defendants.	)	

**AMENDMENT BY INTERLINEATION TO  
PLAINTIFF'S AMENDED COMPLAINT**

In response to discrepancies noted in Defendants' Answers (Doc. Nos. 22 & 23), Plaintiff Stephanie Marie Buchanan amends her Amended Complaint (Doc. No. 15) by interlineation, correcting the reference in Paragraph 5 therein to refer to Defendant Corizon, LLC (instead of Corizon Health), and removing the reference in Paragraph 5 therein to Defendants Rice and Horn, as they are not named defendants in this action. As amended, Paragraph 5 of Plaintiff's Amended Complaint reads:

5. Defendant Corizon, LLC ("Corizon") is a corporation headquartered in Brentwood, Tennessee. According to its website, Corizon "provides quality healthcare services to 107 clients at 531 facilities across the country serving over 345,000 inmates in 27 states" and "is the leading provider of correctional healthcare services in the United States." See <http://www.corizonhealth.com/About-Corizon/Locations>. At all times pertinent hereto, Corizon held itself out as a professional healthcare provider with specialized expertise in providing medical care in correctional facilities, and was

under contract to provide medical services to inmates at WERDCC, including Ms. Buchanan. At all times mentioned herein, Defendant Corizon acted individually and by and through its agents, servants, and employees, including but not limited to Defendant Kapur.

Dated: September 29, 2015

Respectfully submitted,

**HUSCH BLACKWELL LLP**

/s/ Jason Husgen

Jason Husgen (66761MO)  
Edwin J. Smith (67210MO)  
190 Carondelet Plaza, Suite 600  
St. Louis, Missouri 63105  
(314) 480-1500 (telephone)  
(314) 480-1505 (facsimile)  
jason.husgen@huschblackwell.com  
edwin.smith@huschblackwell.com

*Counsel for Plaintiff Stephanie Marie Buchanan*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 29<sup>th</sup> day of September, 2015, the foregoing was filed electronically with the Clerk of Court, to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Jason Husgen \_\_\_\_\_